

The Honorable Mary Jo Heston
Chapter 7
Location: Tacoma

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

DIANE ERDMANN,

Debtor.

No. 19-41238

OBJECTION TO AMENDED EXEMPTIONS

Kathryn A. Ellis, the Chapter 7 Trustee herein, hereby objects to the amended exemptions of the debtor as described below:

1. To the extent that the debtor is attempting to claim an exemption in excess of the value permitted by federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to the debtor's claims of exemption in the amounts of "100%" of fair market value where such statutes are limited in amount;

2. To the extent that the debtor is attempting to claim an exemption for property for which no exemption is permitted under federal or state law, the Trustee objects to the assertion of such an exemption, including but not limited to the debtor's claim of exemption in firearms pursuant to RCW 38.40.150 as either 1) the same were not "issued" to the debtor as a member of an "organized militia of Washington" and 2) if they were, the firearms "shall be and remain public property" and the debtor has no interest in the same to claim them exempt;

3. To the extent that the debtor does not describe an asset or other item of property for which an exemption is claimed with particularity, the Trustee objects to the assertion of such an exemption:

KATHRYN A. ELLIS PLLC
5506 6th Ave S
Suite 207
Seattle, WA 98108
(206) 682-5002

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1 4. To the extent that the actual value of an asset exceeds the valuation of the asset by
2 the debtor, the Trustee objects to the claim of any exemption; and

3 5. To the extent that the debtor has not provided information and/or documentation
4 to the Trustee and/or have failed to cooperate with the Trustee regarding the investigation of her
5 financial affairs and/or concealed any property, the Trustee objects to any claims of exemption
6 by the debtor.

7 The Trustee is objecting, in part, to preserve her rights to object pending receipt of more
8 information about the debtor's assets. The Trustee reserves the right to assert any other basis for
9 her objection or otherwise amend this objection as she may determine to be appropriate at a later
10 date.

11 DATED this 8th day of July, 2019.

12 By: /s/ Kathryn A. Ellis
13 Kathryn A. Ellis, Trustee

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